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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NICOLLE JONES PARKER, an individual,

Plaintiff,

v.

GEICO CASUALTY COMPANY, an entity
licensed to do business in Nevada; DOES I-X,
and ROES XI-XX,

Defendants.

Case No. 2:24-cv-02396-CDS-MDC

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
RESPONSE TO FIRST AMENDED
COMPLAINT**

First Request

Plaintiff NICOLLE JONES PARKER (“Plaintiff”), by and through her attorneys of record, and Defendant GEICO CASUALTY COMPANY (“GEICO”), by and through its attorneys of record, hereby file this Stipulation and Order to extend the deadline for GEICO to file its responsive pleading to the First Amended Complaint (ECF No. 27, filed on Aug. 27, 2025). The current deadline for filing the responsive pleading is Sep. 10, 2025. The parties seek a thirty-day (30) extension of that deadline to October 10, 2025.

The parties have good cause to seek an extension of the current deadline for responding to the First Amended Complaint. Specifically, as indicated by the March 21, 2025 Notice of Bankruptcy (ECF No. 20), Plaintiff initiated a bankruptcy action. In the course of the bankruptcy proceedings, the U.S. Bankruptcy Trustee has authorized resolution of Plaintiff’s suit against

1 GEICO. Counsel have met and had subsequent, multiple communications regarding resolution; their
2 most recent teleconference occurred today. Due to the complexities presented by the bankruptcy
3 proceedings and the need for the U.S. Bankruptcy Trustee's approval of the settlement, the parties
4 sought and received an extension of that deadline to avoid unnecessary litigation costs being
5 incurred that would affect the debtor's (now the U.S. Trustee's) estate. (ECF Nos. 25 and 26).

6 Out of an abundance of caution, Plaintiff filed an amended complaint pursuant to the Court's
7 order granting GEICO's Motion to Dismiss the extra-contractual claims to preserve Mrs. Parker's
8 (and the Trustee's) rights. (*See* ECF No. 24, dated Aug. 12, 2025). The undersigned spoke again
9 yesterday about their progress in moving toward resolution, and the need for the Trustee's approval
10 of a tentative agreement. As such, the parties and their counsel submit that good cause exists for this
11 brief extension of the responsive pleading deadline.

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1 THEREFORE IT IS HEREBY STIPULATED AND AGREED between the parties to
2 extend the deadline for GEICO to file its responsive pleading to the First Amended Complaint from
3 Sep. 10, 2025 to October 10, 2025, thereby allowing for settlement discussions with the U.S.
4 Bankruptcy Trustee to continue.

5 DATED August 28, 2025.

6 McCORMICK, BARSTOW, SHEPPARD,
7 WAYTE & CARRUTH LLP

8 By /s/ Cheryl A. Grames

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17 DATED August 28, 2025.

18 LBC LAW GROUP

19 By: /s/John C. Courtney

20 John C. Courtney
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25 Las Vegas, Nevada 89101
26 *Attorneys for Plaintiff*

27 **IT IS SO ORDERED.**

28 
Hon. Maximiliano D. Couvillier, III
UNITED STATES MAGISTRATE JUDGE

032193-000463 11961424.1

Dated: August 29, 2025